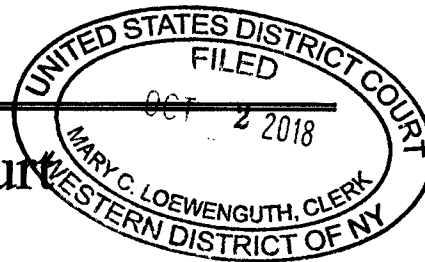


AO 91 (Rev. 02/09) Criminal Complaint



## United States District Court

for the  
Western District of New York

United States of America )

v. )

WILLIAM C. READ )

Defendant )

Case No. 18-MJ-

4130

## CRIMINAL COMPLAINT

I, Kathryn M. Gamble, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about the date of September 24, 2018 through October 1, 2018 in the Western District of New York, the defendant violated 18 U.S.C. § 2422(b), 18 U.S.C. § 2252A(a)(2)(A); and 18 U.S.C. § 2252A(a)(5)(B), offenses described as follows:

the defendant knowingly, using a facility or means of interstate or foreign commerce, attempted to persuade, induce, entice or coerce an individual who had not attained the age of 18 years, to engage in sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(b); and did knowingly distribute and possess child pornography that had been that had been shipped or transported using any means or facility of interstate or foreign commerce or had been shipped or transported in or affecting interstate or foreign commerce by any means, including by computer, in violation of Title 18, United States Code, Section 2252A(a)(2)(A), and Title 18, United States Code, Section 2252A(a)(5)(B).

This criminal complaint is based on these facts:

X Continued on the attached sheet.

Please see attached affidavit

Complainant's signature

Kathryn M. Gamble, Special Agent, H.S.I.  
Printed name and title

Sworn to before me and signed in my presence.

Date: October 2, 2018

Judge's signature

City and State: Rochester, New York

Marian W. Payson, United States Magistrate Judge

18-mj-4130

**AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT**

STATE OF NEW YORK    )  
COUNTY OF MONROE    )    SS:  
CITY OF ROCHESTER    )

I, Kathryn M. Gamble, being duly sworn, depose and state the following:

1.     I am a Special Agent with the Department of Homeland Security (DHS), Homeland Security Investigations (HSI). I have been employed as a Special Agent since June 2008. In my duties with HSI, I investigate crimes involving child exploitation and child pornography, including violations of Title 18, United States Code, Sections 2422(b) and 2252A.

2.     I make this affidavit in support of a criminal complaint charging WILLIAM C. READ with violations of Title 18, United States Code, Sections 2422(b), 2252A(a)(2)(A), and 2252A(a)(5)(b), related to the attempted online enticement of a minor, and the distribution and possession of child pornography.

3.     All information contained in this affidavit is based on my personal knowledge, or has been related to me by other law enforcement agents. Since this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that WILLIAM C. READ did knowingly violate Title 18, United States Code, Sections 2422(b), 2252A(a)(2)(A), and 2252A(a)(5)(b).

4. On or about September 24, 2018, an undercover New York State Police Investigator (the UC) was engaged in an investigation concerning the “Fastmeet” and “Meet24” messaging applications. Fastmeet and Meet24 allow users to chat with others throughout the world via the Internet. Because Fastmeet and Meet24 operate over the Internet, they operate utilizing a means and facility of interstate and foreign commerce, and in and affecting interstate and foreign commerce. Fastmeet and Meet24 are known to law enforcement as mediums through which perpetrators can trade child pornography, among other things.

5. Users of Fastmeet and Meet24 create profiles that are visible to other users. The user profiles often contain the user’s photograph, name, age, and location. The UC’s Fastmeet profile contained a photograph of a young female, and stated that the UC was a 13 year old child residing in Henrietta, NY. On September 24, 2018, the UC received a message from “billy.” According to “billy’s” profile, he was a 33 year old male from Bath, NY. “Billy’s” profile contained multiple photographs depicting a white male in his mid-30’s, posing both by himself and other, and also posing with a female child, who appears to be less than 13-years-old. In his September 24, 2018 message, “billy” stated “if u was older than I would so do u” followed by “can we talk please”. The UC responded, “Lol hi”.

6. On September 25, 2018, “billy” stated, “I want u but I don’t want to go to jail for fucking u”. The UC replied “Like cuz Im 13?? If u dont like me cuz Im younger i get ill leave u alone”. “Billy” then stated, “I want u bad” and “I just don’t want to go to jail”. “Billy” went on to say he was 33 years of age and asked to switch communications to text messaging. The UC supplied a phone number to “billy,” at which point the conversations continued via text message. During the ensuing text message conversations, “billy” sent a

picture of his penis and asked the UC, who was still posing as a 13-year-old female, "Can I see your pussy". "Billy" discussed having sexual intercourse with the child and asked if the child could come to Bath, NY to meet him. The UC advised "billy" that the child could not get to Bath, NY.

7. On September 27, 2018, the UC received a private message from "Meet24" user "jamie" on the UC's Meet24 undercover profile. The UC's Meet24 profile contained a photograph depicting a young female and stated that she was 13 years old, residing in Seneca Falls, New York. "Jamie's" profile stated that she was 25 years old and from Bath, NY. The profile contained multiple pictures of a white female. Notably, "jaime's" profile also contained pictures of "billy" with the same female child that was depicted in "billy's" Fastmeet profile picture. A caption in "jamie's" profile stated, "someone just tell me everything that you would do to me and my family if u seen all four of us in the woods please tell me everything from the start to end please". "Jaime" proceeded to ask the UC, who was posing as a 13 year old female, "how old of a man u want". The UC responded, "Oh idc why". "Jaime" then asked the child if she wanted to lose her virginity and if her parents were supervising her. "Jaime" stated that "her" man would not hurt the child. The UC eventually ignored "Jaime" and the conversation ceased.

8. On or about September 28, 2018, the UC created a Meet24 profile of a 35-year-old male with the name "Young fun." The UC's "Young fun" account indicated his location was in Gang Mills, NY, approximately 16 miles from "jamie's" Meet24 account in Bath, NY. The UC messaged "jamie" stating "Hi. Are you into family fun?" and "I have a niece that's a lot of fun lol hows your family doing??" "Jamie" responded "ok but am looking for a new girlfriend for my husband". The UC, still posing as a 35 year old male, replied, "Oh well I

have a 9 year old niece whos a lotta fun but if you guys aren't into that I get it. Its not for everyone". "Jamie" replied "I am into that" and "can I see full body pic of her please". The UC then sent a pre-approved undercover picture of an adult male who is standing next to a much shorter female, consistent with an adult posting next to a child. "Jamie" responded, "he would do her but he don't want to go to jail for it". The UC and "Jamie" continued to communicate and "Jamie" told the UC to text message her husband "billy" about meeting. "Jamie" provided the same phone number that "billy" had used to communicate with the UC on September 25, 2018, when the UC was posing as a 13-year-old female in Henrietta, NY.

9. Using certain databases available to law enforcement, "billy" was tentatively identified as WILLIAM C. READ (READ), residing in Bath, NY. As set forth in more detail below, this was confirmed on October 1, 2018.

10. On September 28, 2018, the UC, still posing as a 35 year old male, text messaged READ at the number provided by the "billy" and "jamie" accounts. The UC stated, "So Jamie said you like young like I do maybe". READ responded that he did, after which the UC asked what ages READ preferred. READ responded, "All ages as long as I don't go to jail". The UC asked, "So what age is the hottest to you???". READ responded, "9". The UC presented himself as an uncle who was sexually active with his 9-year-old niece. READ went on to discuss engaging in sexual intercourse with the 9-year-old child himself and asked for a picture of the child's vagina. READ then asked if the UC was a cop. The UC replied he was not a cop and READ asked when they could meet. READ asked, "How much of fucking her can I do with her". The UC and READ then discussed child pornography, in which READ told the UC that he had pictures and videos of child pornography on his cell phone. READ then sent a picture to the UC, which, based upon your

affiant's training and experience, constitutes child pornography as defined by Title 18, United States Code, Section 2256(8). It is described as follows:

- a. A photograph depicting female, approximately 5 years old, wearing a purple shirt, with no pants or underwear. Her legs spread apart exposing her nude vagina in a lascivious manner. A white creamy liquid can be seen on her vaginal area, consistent with semen.

The UC received this picture from the defendant while the UC was in Seneca County, New York. READ went on to state that he would show the UC all of his child pornography when they met. READ and the UC planned to meet on Monday October 1, 2018 in order for READ to have sexual intercourse with the UC's 9 year-old niece.

11. On or about September 29, 2018, READ continued to communicate with the UC, who was still posing as a 35 year old uncle of a 9 year old female. READ asked, "So all that is still on." The UC responded, "Hells yea unless you changed your mind." READ responded, "Never I want my dick in her very little pussy very bad" and "Can I fuck her more than one time" and "Can I fuck her in her room". READ then sent the UC a second photograph depicting child pornography as defined by Title 18, United States Code, Section 2256(8). It is described as follows:

- a. A picture depicting a female child who appears to be approximately 5 years of age. The child's legs are spread apart exposing her nude vagina in a lascivious manner. An adult male penis is partially penetrating the child's vagina.

12. In preparation for meeting with the UC, READ had discussed the UC picking READ up at his home, as READ did not have his own transportation. On or about September 30, 2018, READ told the UC that his address was "5 Casey lane apt 101" in Bath, NY, and that the UC could pick READ up at that address for the October 1, 2018 meeting. This address is located in Steuben County, within the Western District of New York. Between September 30, 2018 and October 1, 2018, READ continued to discuss having sexual

intercourse with the UC's 9 year old niece, and specifically asked, "Do u think 5 condoms will do" and "Will u be in the room when I fuck her".

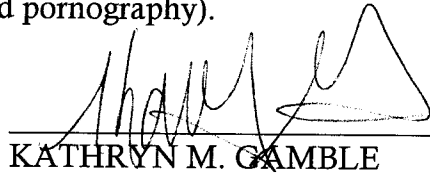
13. On October 1, 2018, the UC continued to communicate with READ, and indicated that the UC would arrive at READ's apartment at approximately 2:00 pm. The UC told READ that he should bring the UC's 9 year old niece candy as a gift. Shortly thereafter, READ texted the UC a photograph of a package of MilkyWay candy bars, which he indicated were for the UC's niece. At approximately 2:00 pm, the UC text messaged READ that the UC was near READ's apartment in a white vehicle, and that READ should come out. READ responded, and at one point spoke to the UC on the phone when looking for the UC's vehicle. READ was then observed approaching the area of the UC's vehicle, at which point he was taken into custody and positively identified as the defendant, WILLIAM C. READ, DOB XX/XX/1985. On his person, officers found condoms, MilkyWay candy bars, and a smartphone.

14. READ was transported to New York State Police barracks in Bath, NY, where he was read *Miranda* warnings. READ indicated that he understood his *Miranda* rights and agreed to waive them and speak with investigators. After initially denying any involvement in the above-described crimes, READ admitted that he had engaged in the above-described conversations with the UC, that he had viewed child pornography in the past, and that he had transmitted child pornography to the UC. READ claimed that he was engaged in his own investigation, and planned to report the UC to the police. When asked, READ denied subjecting any children to physical sexual contact, but admitted that he had become aroused by his 13 year old niece, to the point that he had masturbated while thinking about her.

15. READ'S criminal history includes misdemeanor arrests and convictions, including a 2004 arrest for Sexual Misconduct, in which READ ultimately pled guilty to Endangering the Welfare of a Child.

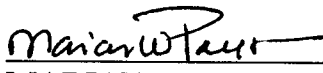
16. READ was born in 1985, and is 33 years old. According to New York State Penal Law Section 130.35(4), it is a Class A Felony for any person to engage in sexual intercourse with a child less than 13 years old, when the actor is 18 years old or more.

WHEREFORE, based on the foregoing, I respectfully submit that there is probable cause to believe that WILLIAM C. READ did knowingly violate Title 18, United States Code, Section 2422(b) (attempted online enticement of a minor); Title 18 United States Code, Section 2252A(a)(2)(a) (distribution of child pornography); and Title 18 United States Code Section 2252A(a)(5)(b) (possession of child pornography).

  
KATHRYN M. GAMBLE  
Special Agent  
Homeland Security Investigations

Sworn to before me this

October 2, 2018.

  
MARIAN W. PAYSON  
United States Magistrate Judge